

Dove & Chill
Attorneys at Law
1020 Highland Colony Parkway, Suite 412
Ridgeland, MS 39157

LUKE DOVE
MARLANE E. CHILL

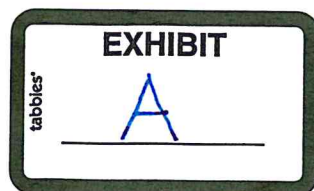
Telephone: (601) 352-0999

Statement for Legal Services
Related to Motion for Contempt

DATE: October 20, 2015

RE: MCF AF, LLC v. Eduardo A. Flechas, United States District Court,
Southern District of Mississippi, Northern Division; No. 3:13-cv-00621-DPJ-FKB

Date	Timekeeper	Description	Time
9/30/2015	LD	Prepare Motion for Citation of Contempt	3.0
9/30/2015	MB	Prepare documents for Motion for Citation of Contempt; Revise Motion for Citation of Contempt; prepare exhibits	2.0
10/1/2015	LD	Receipt and review of MCF's Motion for Contempt; email correspondence with counsel re: contempt	0.3
10/2/2015	LD	Receipt and review of Flechas' Motion to Stay, Flechas' Response to Motion for Contempt, and MCF's Response to Motion to Stay; email correspondence with counsel re: contempt	0.5
10/4/2015	LD	Email correspondence with counsel re: contempt	0.3
10/5/2015	LD	Receipt and review of Flechas' Motion to Continue, Subpoena issued to Ashlee Flechas, Ashlee Flechas' Motion to Dismiss, MCS's Rebuttal in Support of Motion for Contempt	0.3
10/6/2015	LD	Telephonic court appearance, review RMC's Joinder in MCS' Motion for Contempt; email correspondence with counsel re: contempt	1.0



10/7/2015	LD	Receipt and review of MCF's Rebuttal in Support of Motion for Contempt, Flechas' Motion to Dismiss and MCF's Motion to Strike Motion to Dismiss; email correspondence with counsel re: contempt	0.5
10/7/2015	MB	Prepare and organize documents and pleadings for contempt hearing	1.0
10/8/2015	LD	Receipt and review of Flechas' Response to Motion to Strike; email correspondence with counsel re: contempt	0.3
10/8/2015	MB	Prepare and organize documents and pleadings for contempt hearing	3.8
10/11/2015	LD	Email correspondence with counsel re: contempt	0.3
10/12/2015	LD	Prepare Agreed Orders for bankruptcy court; prepare confidential settlement memo; email correspondence with counsel re: contempt	3.0
10/12/2015	MB	Revise Agreed Orders converting bankruptcies to Chapter 11; revise memo to the Court	3.2
10/13/2015	MB	Email correspondence with Ms. Glaze re: Orders converting bankruptcy cases to Chapter 11; revise Orders; preparation for court appearance on contempt Order	1.6
10/14/2015	LD	Email correspondence with counsel re: contempt	0.2
10/15/2015	LD	Email correspondence with counsel re: contempt	0.2
10/16/2015	LD	Email correspondence with counsel re: contempt	0.2
10/17/2015	LD	Email correspondence with counsel re: contempt	0.2
10/19/2015	LD	Court appearance re: contempt order	4.0
10/20/2015	LD	Receipt and review of Agreed Judgment of Contempt	0.3

TOTAL TIME AND CHARGES:

Luke Dove (14.6 hrs @ \$300/hr)	\$4,380.00
Michelle Brister (11.6 hrs @ \$90/hr)	\$1,044.00

EXPENSES:

PACER	\$26.60
-------	---------

TOTAL EXPENSES	\$26.60
----------------	---------

BALANCE DUE	\$5,450.60
-------------	------------

MacNeill, McKay & Gay, PLLC**Attorneys at Law**

Physical and Mailing Address:
582 Lakeland East Drive
Suite B
Flowood, Mississippi 39232

Laura M. Glaze
Telephone: 601-936-2800
Facsimile: 601-936-2801
Direct: 601-936-2828
E-mail: lglaze@mmgms.com

**Statement for Legal Services
Related to Motion for Contempt**

DATE: October 21, 2015

**RE: MCF AF, LLC v. Eduardo A. Flechas, United States District Court,
Southern District of Mississippi, Northern Division; No. 3:13-cv-00621-DPJ-FKB**

Date	Description	Time
9-25-15	Receive and review Affidavit of Ed Flechas re: \$391,000 of \$400,000 missing from frozen account; claims account not governed by order, loans to law firm, etc.; phone conference with Luke Dove re: same	.5
9-27-15	Legal research regarding civil contempt for use in motion; email to Luke Dove re: same	2.0
9-28-15	Phone call to Mississippi Bar office of General Counsel re: potential bar complaint based on missing funds and contempt; emails from various creditors and counsel regarding strategy for moving forward	.7
9-30-15	Emails from Ed Flechas; emails among counsel re: motion for contempt; emails with Ed Flechas, Luke Dove, and Craig Panter re: whether Ed will agree to bankruptcies; revise Motion for Contempt drafted by Luke Dove and return to Luke Dove for review.	1.6
10-01-15	Receive and review of Motion for Contempt and Brief filed by MCF AF; finalize and file Motion for Citation of Contempt on behalf of MCS Capital; emails re: hearing date for Motion for Contempt; draft and file Motion to Restrict Access to Exhibit B to the Motion for Contempt (Affidavit of Ed Flechas)	1.5
10-02-15	Emails to try to get Ed Flechas to discuss his availability for hearing on Motion for Contempt; receive and review of Flechas' Motion to Stay Proceedings to give him time to find a new attorney; receive and review Notification regarding Subpoena issued for Ashlee Flechas; receive and review of Flechas's Response in Opposition to Motions for Contempt and brief; Receive and review text order setting hearing on contempt motions for October 7, 2015 at 1:30 p.m.; and setting deadlines for creditors to file replies to Flechas's response to Motion for Contempt; receive and review of Flechas's Motion to Stay Proceedings.	1.0

- 10-04-15 Email from Luke Dove re: preparing and issuing subpoena on Craig Panter to testify at contempt hearing .1
- 10-05-15 Legal research for and draft MCS's Reply to Flechas's Response to Motion for Contempt; file same; Receive and review Notice of Appearance by James Bell; Receive and Review Motion to Continue Contempt Hearing filed by James Bell; receive and review Notification that Ashlee Flechas has been served with subpoena; receive and review Motion to Dismiss Ashlee Flechas for lack of jurisdiction and Brief in Support; Receive and review amended Motion to Dismiss for Ashlee Flechas; receive and review MCF AF's Rebuttal re: motion for contempt; Receive and review Craig Panter's proposed Order granting his Motion to Withdraw. 2.5
- 10-06-15 Receive and review Text Order from Court re: telephonic conference; emails among counsel re: time for conference call; receive and review of text order re: extensions and restricted access to Exhibit "B" to MCS Motion for Contempt; telephonic conference with Judge Jordan and all counsel re: hearing on motions for contempt, which are reset for 10/09/15 at 1:30 p.m.; receive and review RMC's Joinder in MCS's Motion for Contempt 1.4
- 10-07-15 Receive and review Flechas's Motion to Dismiss Motions for Contempt based on Bankruptcy Stay and Brief in Support; receive and review letter from Caleb Koonce to Judge Jordan with Flechas's proposed plan to purge contempt and soft-pedaling the knowing nature of his actions; emails regarding proposed stipulation of Panter testimony in an effort to try to relieve Craig from having to testify; receive and review MCF AF's Rebuttal Memo in Support of Motion for Contempt against Ashlee Flechas; receive and review MCF AF's Motion to Strike Motion to Dismiss Ashlee Flechas 1.5
- 10-08-15 Email from Judge Ball's chambers – settlement conference set for October 19, 2015 to go on despite Motions for Contempt and missing money; receive and review notification regarding telephone conference with Judge Ball on 10/13/15 at 1:30 p.m. to discuss feasibility of settlement conference given the missing money with directions for counsel for MCS to set up call; receive and review Flechas's Response to MCF AF's Motion to Strike Flechas's Motion to Dismiss; receive and review Judge Ball's Order Allowing withdrawal of Craig Panter; Receive and review letter to Judge Jordan from James Bell with supplement to Affidavit by Flechas in which Flechas admits that he signed Ashlee's name to checks from Flechas Family Holdings, LLC account; receive and review text order terminating Motion to Stay Proceedings as moot; emails to and from clients regarding new supplement to affidavit; issue subpoena to Craig Panter; emails to and from Craig Panter re:

- acceptance of subpoena via email; receive and review MCF AF's Rebuttal re: Motion to Strike; emails regarding proof to be offered at tomorrow's hearing; 2.2
- 10-09-15 Receive and review Text Order from Court; receive and review email from William Bell attaching bank statements from Flechas Family Holdings, LLC; study bank statements to see that: Flechas is a named owner of account after he had denied control of account; numerous checks were written out of account after frozen by court order; Ed Flechas signed "Caroline Flechas" to checks but for one on which he signed his own name; prepare for hearing to include gathering documents and questions for Craig Panter and Ed Flechas; attend hearing and participate in settlement negotiations; receive and review Minute Entry for Proceedings; emails from and to Jim Spencer re: form of Bankruptcy Orders 7.2
- 10-12-15 Email from Stephanie Rippee with draft of contempt order; multiple emails among counsel re: suggested revisions; receive and review new version of contempt order with revisions .5
- 10-13-15 Emails regarding final revisions to contempt order before sending to Flechas's counsel; circulate bankruptcy orders among creditors' counsel; receive and review emails re: suggested revisions to Bankruptcy Orders; revise bankruptcy orders and email to Stephanie Rippee since they will be exhibits to the contempt order; telephonic conference call with Judge Ball and all attorneys re: whether to have settlement conference in light of missing money; emails re: creditor attorney conference call per Judge Ball's direction; email from Caleb Koonce re: he can't approve bankruptcy orders and Ed Flechas will consult with bankruptcy attorney on Thursday morning; receive and review notice from Judge Ball setting telephonic conference for 10/15/15 at 1:30 p.m. to discuss questions that arose re: moving forward in light of contempt 1.6
- 10-14-15 Receive and review detailed email from William Bell re: objections to form of Contempt Order; receive and review email from Stephanie re: proposed revisions in light of those objections; detailed email from Danny Cupit proposing litigation plan per Judge Ball's request; emails to and from Caleb Koonce re: form of Bankruptcy orders; telephonic conference with all counsel re: plan for continued litigation; email from Judge Jordan's chambers re: filing supplemental Affidavit of Ed Flechas (restricted); receive and review notice of filing of official transcript of contempt proceeding. 1.2
- 10-15-15 Telephonic conference of all creditors' counsel following up on yesterday's call after attorneys have checked in with their clients; receive and review edits to contempt order from Caleb Koonce; study language changes; email among counsel re: same; telephonic conference call with

	Judge Ball and all counsel to discuss Monday's conference and issues re: reaching agreement on form of the contempt order; receive and review revised draft of contempt order; phone call to client re: changed nature of Monday's conference	1.5
10-16-15	Emails re: final form of creditors' proposed contempt order; receive and review email from Stephanie Rippee to Court transmitting same for consideration; receive and review email from Caleb Koonce re: Flechas's proposed contempt order; receive and review Flechas's Motions to Convert Bankruptcy proceedings filed pro se; receive and review email from Stephanie Rippee to court re: Flechas's filings in Bankruptcy court	.4
10-19-15	Emails from and to Luke Dove re: conference with Judge Ball	.2
10-20-15	Receive and review entered Agreed Judgment of Contempt; submit agreed orders regarding bankruptcies to Judge Ellington; receive and review notice of hearing in bankruptcy court re: Flechas's motion to convert; email from Stephanie Rippee re: response to Flechas's motions to convert	.5

TOTAL TIME AND CHARGES:

Laura M. Glaze (28.10 hrs @ \$200.00/hr)	\$5,620.00
---	-------------------

AMOUNT DUE.....\$5,620.00